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11 Attorneys for Defendant
12 EXPERIAN HOLDINGS, INC.

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA

15 COLIN RYAN AND CAITLAN
16 LANGE, on behalf of themselves and
17 all others similarly situated,

18 Plaintiffs,

19 v.

20 EXPERIAN HOLDINGS, INC. and
21 EXPERIAN INFORMATION
22 SOLUTIONS, INC.

23 Defendants.

Case No. 8:15-cv-01595 JVS (DFMx)

Hon. James V. Selna

**STIPULATION TO EXTEND
TIME TO RESPOND TO
AMENDED COMPLAINT**

Pursuant to Local Rule 8-3, Plaintiffs Collin Ryan and Caitlan Lange, and Defendants Experian Holdings Inc. and Experian Information Solutions, Inc. (collectively, the “Parties”) hereby stipulate that Defendants shall have an additional 30 days, up to and including December 4, 2015, to respond to Plaintiffs’ Amended Complaint. Defendant was served with Plaintiffs’ initial Complaint on October 14, 2015. Plaintiffs voluntarily amended their complaint on October 16, 2015, and Defendants’ current response date to the Amended Complaint is November 4, 2015. The Parties stipulate that Defendants’ new response date to the Amended Complaint is December 4, 2015.

The parties have agreed to this stipulation in the spirit of cooperation and for good cause given the complexity of the issues raised in Plaintiffs’ complaint, which requires a through investigation by Defendants of Plaintiffs’ claims and allegations, prior to Defendants filing their response. Pursuant to the Court’s Procedures and Schedules, the Parties are submitting a proposed order with this stipulation, and the proposed order includes the Parties’ proposed dates.

Pursuant to Local Rule 5-4.3.4, Richard J. Grabowski hereby attests that the following signatories concur in the filing’s content and have authorized the filing.

Dated: October 20, 2015

JONES DAY

By: /s/ Richard J. Grabowski
Richard J. Grabowski

Counsel for Defendants
EXPERIAN HOLDINGS, INC. AND
INFORMATION SOLUTIONS, INC.

Dated: October 20, 2015

ROBINSON CALCAGNIE
ROBINSON SHAPIRO DAVIS INC.

By: /s/ Mark P. Robinson, Jr.
Mark P. Robinson Jr.

Counsel for Plaintiffs
COLIN RYAN AND CAITLAN
LANGE